

RE: Information Only Copy of Talk America Services, LLC Filing with the FCC

Dear Sir or Madam:

For information purposes only, please find enclosed a copy of the Application that Talk America Services, LLC filed with the FCC to discontinue offering of certain operator services throughout its service territory.

This copy is provided in accordance to Section 214 (a) of the Communications Act of 1934, as amended, and 47 C.F.R. §63.71 is provided in compliance Federal Communications Commission's Rules.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to sthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas Consultant to Talk America Services, LLC

file: Talk America Services - FCC

ST/im



June 21, 2016 Via ECFS

Secretary, Federal Communications Commission Washington, DC 20554 ATTN: Wireline Competition Bureau

RE: Section 63.71 Application of Talk America Services, LLC to Discontinue Services

Dear Madam Secretary:

Enclosed please find the Application to Discontinue Services submitted on behalf of Talk America Services, LLC ("Company"). The Company is seeking approval to discontinue certain operator services throughout its service territory. This filing is made pursuant to Section 214(a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71.

A copy of this Application is being sent to the affected state Governors, Public Service / Utility Commissions, and the Department of Defense, as provided in Exhibit B.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to sthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas Consultant to Talk America Services, LLC

- cc: Talk America Talk America Services
- cc: Service List (via US Mail) Secretary of Defense, Pentagon (via US Mail) Rodney McDonald, FCC (via Email)
- file: Talk America Services Other
- tms: FCx1602

ST/im

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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In the Matter of Section 63.71 Application of Talk America Services, LLC to Discontinue Services

File No.

Section, 63.71 Application of Talk America Services, LLC

Talk America Services, LLC ("Talk America Services" or "Applicant") hereby seeks authorization

pursuant to Section 214 (a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, to

discontinue offering certain operator services throughout its service territory in the United States.

Applicant is considered a non-dominant telecommunications carrier with respect to all of its services,

including those affected by the proposed discontinuance.

Talk America Services provides the following information pursuant to Section 63.71 of the

Commission's rules:

1. Name and corporate headquarters address of Carrier

Talk America Services, LLC 10802 Executive Center Drive Benton Building, Suite 300 Little Rock, AR 72211

Correspondence concerning this Application should be sent to:

Sharon ThomasConsultant to Talk America Services, LLCTechnologies Management, Inc.151 Southhall Lane, Suite 450Maitland, FL 32751Telephone:407-740-3031Facsimile:407-740-0613E-Mail:sthomas@tminc.com

2. Date of Planned Service Discontinuance, Reduction or Impairment:

Talk America Services proposes to discontinue the operator services that are the subject of this Application on or after August 1, 2016, pending the Commission's approval of the discontinuance. As explained below, Talk America Services relies on the wholesale provisioning of these services by the underlying carriers (e.g., AT&T and Verizon) of certain Windstream Communications' Competitive Local Exchange Carrier ("CLEC") subsidiaries from whom Talk America Services purchases services for resale to its end users. As a result, once the underlying carriers discontinue the operator service offerings, Talk America Services will no longer be able to purchase them for resale from the Windstream CLECs. For example, AT&T has already received approval to discontinue its operator services¹, and Verizon recently sent notice to the FCC of its proposed discontinuance of certain operator services, effective August 9, 2016.

3. Points of Geographic Areas of Service Affected:

Applicant proposes to discontinue the provision of the operator services in all states and in the District of Columbia.

4. Brief Description of Types of Service Affected:

Applicant proposes to discontinue the following operator services:

1. **Collect Calling -** a billing arrangement by which the charge for an operator assistance call may be reversed (charged to the called station) provided the charge is accepted at the called station.

2. **Person-to-Person Calling** - a service where the person originating an operator assistance call specifies to the operator a particular person to be reached, a particular mobile service point to be reached through a Mobile Telephone Service attendant, or particular PBX service point, department, or office to be reached.

¹ It is the Applicant's understanding that AT&T has agreed to extend the availability of the operator services that are subject to its planned discontinuance to the Windstream CLECs whose services Talk America Services resells until August 1, 2016.

3. **Billed to Third Party** - a billing arrangement by which an operator assistance call may be charged to an authorized station other than the station originating the call or the station where the call is terminated.

4. Busy Line Verification (BLV) - allows an operator to establish a "talking" connection to an apparently busy station line to determine if the station line is in working order.

5. Busy Line Interruption (BLI) – allows an operator to interrupt a voice conversation in progress on a line to advise the interrupted subscriber that the interrupting party has a need to reach the subscriber.

6. International Directory Assistance - allows customers to obtain telephone numbers for international locations where such information is available.

Talk America Services proposes to discontinue these services for two reasons. First, in those locations where AT&T or Verizon is the underlying ILEC to the Windstream CLECs (who provides this service to Talk America Services), Talk America Services will no longer be able to offer these services on a retail basis once AT&T and Verizon discontinue their wholesale offerings.² Second, there has been very low demand for these services and Applicant believes such trend will only continue if not decrease even more, irrespective of the territory in which Talk America Services offers service. Therefore, Talk America Services intends to discontinue these offerings throughout its service territory, including locations where other ILECs provide wholesale operator services, such as CenturyLink, Frontier and Windstream, coincident with their anticipated discontinuance of these offerings.

These services have declined in popularity over the years due to the growth of other communication methods, including mobile phones, text messaging, email, and other social media applications. With respect to International Directory Assistance, many international telecommunications carriers no longer provide operator assistance services, which makes the service obsolete in those countries.

Talk America Services, through its underlying carriers, will continue to provide Sent Paid Calls (e.g., direct dial assistance), Emergency Call Assistance and rate quotes where currently provided.

² Talk America Services believes that other ILECs, such as CenturyLink, may also discontinue these operator services in the near future.

5. Brief Description of Dates and Methods of Notice to All Affected Customers:

The Applicant has provided written customer notice of the planned discontinuance in accordance with the requirements of section 63.71 (a) of the Commission's Rules. Notice is being provided via bill messages sent to affected customers in the June 2016 bill cycles (June 1 - 28). The text of the customer notice is attached hereto as Exhibit A. Because certain operator services which are being discontinued (e.g., collect calling) may impact customers outside of a state where they receive local services from Talk America Services, and to avoid any customer confusion, we have indicated in the customer notice that the discontinuance affects all 50 states and the District of Columbia.

A copy of this Application is being sent to each of the affected state regulatory commissions, state governors' offices and the Department of Defense, as required under Section 63.71, concurrent with this filing. A service list is provided in Exhibit B.

Conclusion

Talk America Services respectfully requests that the Commission approve its Section 63.71 Application to discontinue the Operator Services described herein. Pursuant to Section 214(a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, Talk America Services understands that this application will be automatically granted on the 31st day after the Public Notice is released, with no Commission notification to the Company, unless the Commission has notified the Company that the grant will not be automatically effective.

Dated this 16th day of June, 2016.

By: Keith Harvey

Vice President, Assistant General Counsel Talk America Services, LLC

Sharon Thomas, Consultant toTalk America Services, LLCTechnologies Management, Inc.151 Southhall Lane, Suite 450Maitland, FL 32751Telephone:407-740-3031Facsimile:407-740-0613E-Mail:sthomas@tminc.com

Exhibit A

Customer Notice

Exhibit A

Text of Customer Notice

Pending applicable regulatory approvals, on or after August 1, 2016, Talk America Services will no longer offer the following operator services: Person-to-Person calls, calls Billed to Third Party, Collect Calling, Busy Line Verification/Interruption Service, and International Directory Assistance in all 50 states and the District of Columbia.

A filing is being made with the FCC for discontinuance of Special Operator Services, including Person-to-Person calls, calls Billed to Third Party, Collect Calling, Busy Line Verification/Interruption Service, and International Directory Assistance. The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Talk America Services, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

Talk America Services' customer service can be reached at 1-855-546-5000 or <u>customercare@talkamericaservice.com</u> or in writing at 2134 W Laburnum Ave., Richmond, VA 23227. Exhibit B

Service List

Walter L. Thomas, Jr., Secretary Alabama Public Service Commission 100 N. Union Street, Suite 850 Montgomery, AL 36130

Michael Sappington, Commission Secretary Arkansas Public Service Commission 1000 Center Street Little Rock, AR 72203

Docket Control Center Arizona Corporation Commission 1200 W. Washington Street Phoenix, AZ 85007-2927

Telecommunications Division California Public Utilities Commission Telecommunications Division 505 Van Ness Avenue, 3rd Floor San Francisco, CA 94102

Mr. Douglas Dean, Director Colorado Public Utilities Commission 1560 Broadway, Suite 250 Denver, CO 80202

Mr. Jeffery R. Gaudiosi, Esq. Connecticut Public Utilities Regulatory Authority 10 Franklin Square New Britain, CT 06051

Ms. Brinda Westbrook-Sedgwick, Secretary Public Service Commission of the District of Columbia 1333 H Street NW, Suite 200W Washington, DC 20005

Mr. Robert Howatt, Executive Director Delaware Public Service Commission 861 Silver Lake Blvd., Suite 100 Cannon Building Dover, DE 19904

Ms. Carlotta S. Stauffer, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Mr. Reece McAlister, Executive Secretary Georgia Public Service Commission 244 Washington Street SW Atlanta, GA 30334-5701

Ms. Joan Conrad, Executive Secretary Iowa Utilities Board 1375 E. Court Avenue, RM 69 Des Moines, IA 50319-0069

Ms. Jean Jewell, Secretary Idaho Public Utilities Commission 472 West Washington Statehouse Boise, ID 83720-0074 Ms. Amy L. Green, Secretary Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, KS 66604-4027

Mr. Jeff Derouen Kentucky Public Service Commission 211 Sower Blvd. Frankfort, KY 40602-0615

Ms. Eva Kahao Gonzalez, Secretary Louisiana Public Service Commission Galvez Building 602 North 5th Street, 12th Floor Baton Rouge, LA 70802

Ms. Sara J. Clark, Secretary Massachusetts Department of Telecommunications & Cable (DTC) 1000 Washington Street, Suite 820 Boston, MA 02118-6500

Mr. David Collins, Executive Secretary Maryland Public Service Commission Telecommunications Division 6 St. Paul Street Baltimore, MD 21202

Mr. Harry Lanphear, Administrative Director Maine Public Utilities Commission 101 Second Street Hallowell, ME 04347

Ms. Robin Ancona, Director, Telecommunications Michigan Public Service Commission 7109 W. Saginaw Highway Lansing, Michigan 48917-1120

Mr. Daniel P. Wolf, Executive Secretary Minnesota Public Utilities Commission 121 7th Place East, Suite 350 St. Paul, MN 55101

Mr. Stephen Reed, Executive Secretary &Gen. Counsel Missouri Public Service Commission Office of the Public Counsel 200 Madison Street, Suite 650 Jefferson City, MO 65102-0360

Mr. Brian Ray, Executive Secretary Mississippi Public Service Commission Woolfolk Building 501 North West Street, Suite 201A Jackson, MS 39201

Ms. Kate Whitney, Program Director Montana Public Service Commission 1701 Prospect Avenue Helena, MT 59620-2601

Ms. Gail Mount, Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, NC 27699-4325 Ms. Elizabeth A. Rolando, Chief Clerk Illinois Commerce Commission 527 East Capitol Avenue Springfield, IL 62701

Ms. Brittany Webb, Tariff Administrator Indiana Utility Regulatory Commission 101 West Washington Street Suite 1500 East Indianapolis, IN 46204

Ms. Irene Kim Ashbury, Secretary New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor Trenton, NJ 08625-0350

Records Department New Mexico Public Regulation Commission Utilities Division 1120 Paseo De Peralta Santa Fe, NM 87504

Ms. Breanne Potter, Assistant Secretary Public Utilities Commission of Nevada 1150 E. William Street Carson City, NV 89701-3109

Mr. Jeffery Cohen, Acting Director New York Public Service Commission Three Empire State Plaza Agency Building 3 Albany, NY 12223-1350

Ms. Betty McCauley, Commission Secretary Public Utilities Commission of Ohio 180 East Broad Street, 13th Floor Columbus, OH 43215-3793

Director of PUD Oklahoma Corporation Commission Public Utilities Division, Room 103 2101 N. Lincoln Avenue Oklahoma City, OK 73105

Mr. Richard Willis, Executive Director Oregon Public Utilities Commission Telecom Division 201 High St SE Salem OR 97301-3612

Ms. Rosemary Chiavetta, Commission Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor Harrisburg, PA 17120

Ms. Luly Massaro, Chief Clerk & Administrator Rhode Island Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888 Mr. Darrell Nischke, Executive Secretary North Dakota Public Service Commission 600 E. Boulevard Avenue, Dept. 408 Bismarck, ND 58505-0480

Mr. Jeff Pursely, Executive Director Nebraska Public Service Commission 300 The Atrium 1200 N Street Lincoln, NE 68508

Ms. Lisa Cleveland, Tariff Administrator New Hampshire Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, NH 03301-2429

Ms. Sharla Dillon Tennessee Regulatory Authority Attn: Utilities Division 502 Deaderick Street, 4th Floor Nashville, TN 37243

Central Records Clerk Public Utility Commission of Texas Central Records Division 1701 N. Congress Avenue Austin, TX 78711-3326

Commission Secretary Utah Public Service Commission Heber M. Wells Building 160 East 300 South Street Salt Lake City, UT 84114

Mr. Joel Peck, Esq, Clerk of Commission Virginia State Corporation Commission Tyler Building, 1st Floor 1300 E. Main Street Richmond, VA 23219

Ms. Judith C. Withney, Acting Clerk of the Board Vermont Public Service Board 112 State Street, 4th Floor Montpelier, VT 05620-2701

Mr. Steven V. King, Executive Director & Secretary Washington Utilities & Transportation Commission 1300 S. Evergreen Park Drive, SW Olympia, WA 98504-7250

Ms. Sandy Paske, Commission Secretary Wisconsin Public Service Commission 610 N. Whitney Way Madison, WI 53705-2729

Ms. Ingrid Ferrel, Executive Secretary West Virginia Public Service Commission 201 Brooks Street Charleston, WV 25323 Ms. Joycelyn Boyd, Chief Clerk & Administrator South Carolina Public Service Commission 101 Executive Center Drive, Suite 100 Columbia, SC 29210

Ms. Patricia Van Gerpen, Executive Director South Dakota Public Utilities Commission Capitol Building, 1st Floor 500 East Capitol Avenue Pierre, SD 57501-5070

Ms. Eleanor Tuiasosopo, Chief Clerk Haiwaii Public Utilities Commission 465 S. King Street, Room 103 Honolulu, HI 96813 Ms. Chris Petrie, Secretary & Chief Counsel Wyoming Public Service Commission Hansen Building, Suite 300 2515 Warren Avenue Cheyenne, WY 82002

Regulatory Commission of Alaska 701 West 8th Avenue, Suite 850 Montgomery, AL 36130

United States Department of Defense' Office of the Secretary Pentagon Attn. Special Asstistant for Telecom. Washington, DC 20301 Governor of Alabama State Capitol 600 Dexter Avenue Montgomery, AL 36130

Governor of Arizona 1700 W. Washington Phoenix, AZ 85007

Governor of Arkansas State Capitol Building Little Rock, AR 72201

Governor of California State Capitol Building Sacramento, CA 95814

Governor of Colorado 136 State Capitol Denver, CO 80203-1792

Governor of Connecticut State Capitol, 210 Capitol Ave. Hartford, CT 06106

Governor of Delaware 820 N. French St. Wilmington, DE 19801

Governor of Florida The Capitol Tallahassee, FL 32399-0001

Governor of Georgia State Capitol, Room 111 Atlanta, GA 30334

Governor of Idaho 700 W. Jefferson, 2nd Floor Boise, ID 83720-0034

Governor of Illinois 207 State House Springfield, IL 62706

Governor of Indiana State Capitol Building Indianapolis, IN 46204

Governor of Iowa State Capitol Des Moines, IA 50319

Governor of Kansas State Capitol, Second Floor Topeka, KS 6612

Governor of Kentucky 700 Capitol Ave. Frankfurt, KY 40601 Governor of Louisiana PO Box 94004 Baton Rouge, LA 70804

Governor of Maine State House Station #1 Augusta, ME 04330

Governor of Maryland State Capitol Building Annapolis, MD 21401

Governor of Massachusetts Room 360 Boston, MA 02133

Governor of Michigan PO Box 30013 Lansing, MI 48909

Governor of Minnesota 75 Constitution Ave. St. Paul, MN 55155

Governor of Mississippi PO Box 139 Jackson, MS 39205

Governor of Missouri Missouri Capitol Bldg, Rm 216 Jefferson City, MO 65102-0720

Governor of Montana State Capitol Building Helena, MT 59620

Governor of Nebraska PO Box 94848 Lincoln, NE 68509-4848

Governor of Nevada 101 N. Carson Street Carson City, NV 89701

Governor of New Hampshire State House Concord, NH 03301-4990

Governor of New Jersey PO Box 004 Trenton, NJ 08625

Governor of New Mexico State Capitol Building Santa Fe, NM 87503 Governor of New York State Capitol Building Albany, NY 12224

Governor of North Carolina 116 West Jones St. Raleigh, NC 27603

Governor of North Dakota 600 E. Boulevard Avenue Bismark, ND 58505-0001

Governor of Ohio 77 South High St., 30th Floor Columbus, OH 43215

Governor of Oklahoma State Capitol Building, Room 212 Oklahoma City, OK 73105

Governor of Oregon State Capitol Building Salem, OR 97310

Governor of Pennsylvania 225 Main Capitol Harrisburg, PA 17120

Governor of Rhode Island 222 State House Providence, RI 02903-1196

Governor of South Carolina PO Box 11829 Columbia, SC 29211

Governor of South Dakota 500 East Capitol Pierre, SD 57501-5070

Governor of Tennessee State Capitol Building Nashville, TN 37243-0001

Governor of Texas PO Box 12428 Austin, TX 78711-2428

Governor of Utah 210 State Capitol Salt Lake City, UT 84114

Governor of Vermont 109 State St. Montpelier, VT 05609

Governor of Virginia State Capitol Building, 3rd Floor Richmond, VA 23219 Governor of Washington PO Box 40002 Olympia, WA 98504-0002

Governor of West Virginia State Capitol Complex Charleston, WV 25305

Governor of Wisconsin PO Box 7863 Madison, WI 53707

Governor of Wyoming 200 West 24th Street Cheyenne, WY 82002

Office of Mayor of District of Columbia 1350 Pennsylvania Ave NW, Washington, DC 20004

Governor of Alaska 3rd Floor, State Capital PO Box 110001 Juneau, AK 99811

Governor of Hawaii State Capitol Honolulu, Hawaii 96813

CERTIFICATE OF SERVICE

STATE OF FLORIDA)

COUNTY OF ORANGE)

On this date, June 21, 2016, Notice of the foregoing Section 63.71 Application has been sent by U.S. Mail postage prepaid to the service list contained in Exhibit B.

/s/Keith Rice For Shipping Department Technologies Management, Inc.

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